

cv-04023-LGS Document 484 Filed 08/17/22 Page 1 of 1 Neufeld Scheck & Brustin, LLP

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August 17, 2022

Via ECF

Honorable Lorna G. Schofield United States District Judge U.S. District Court, Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, NY 10007

Re: Rosario v. City of New York, et al., Case No. 18-cv-4023

Dear Judge Schofield:

Plaintiff writes to respectfully request an extension of the deadline to file a motion seeking attorney's fees and costs, which is currently set at August 26, 2022, pursuant to Federal Rule 54(d)(2)(B), to October 7, 2022. This is Plaintiff's first request. Defendants have no objection to the extension.

Due to planned vacations and upcoming deadlines in other cases that were postponed during the trial in this case, Plaintiff requires more time to adequately prepare the fee application. In addition, Plaintiff's counsel will need to coordinate with former employees and review hours spanning 5 years of litigation. The extension will also allow the parties to meet and confer to determine whether it is possible to avoid litigation on the fee award.

Plaintiff thanks the Court for its attention to the matter.

Respectfully submitted,

/s/ Anna Benvenutti Hoffmann Anna Benvenutti Hoffmann Counsel for Plaintiff

Cc: all counsel (via ECF)